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March 21, 2022

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Hon. Colleen McMahon
Senior United States District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2550
New York, New York 10007

Re: *Pearlstein v. Blackberry Limited*, No. 1:13-cv-7060 (CM) (KHP) (S.D.N.Y.)

Dear Judge McMahon:

I write with regard to the time estimates reflected in today's order (ECF No. 795), which appears to have inadvertently transposed the time estimates provided to the Court by counsel for the parties at the Final Pretrial Conference, as reflected in the hearing transcript. At the conference (and with respect to witnesses Todd Cox and Paul Holtz, in separate submissions), we estimated a total of 36-39 hours for witness examinations by defense counsel. The list of witnesses and the time estimates we previously provided are attached. I believe that plaintiffs' counsel had estimated about 24 hours for their witness examinations at the Final Pretrial Conference.

Consistent with the time estimates provided at the conference, we ask that the Court modify today's order to permit 35 hours for examination by defense counsel.

Respectfully submitted,

s/Dan Marmalefsky

Dan Marmalefsky

cc: All counsel of record (by ECF)

(to be called by Plaintiffs)

Barron	15 minutes
Boulben	1 hour
Bidulka	1.5 to 2 hours
Connolly	15 minutes
Cox	1 hour
Dinzik	30 minutes
Dietel	30 minutes
Erdem	1 hour
Feinstein	45-60 minutes
Heins	7 hours
Hjort	15 minutes
Kearns	1 to 1.5 hours
Luelo	30 minutes
Lys	1.5 hours
Portnoy	15 minutes
Powell	2 hours
Sweeney	15 minutes
Zipperstein	1.5 hours

(to be called by Defendants)

Carpino	30 minutes
Chiarello	1 hour
Costanzo	45 minutes
Dunham	45 minutes
Ferrell	2 hours
Holtz	15 minutes
Keiningham	1 hour
Lundie	1.5 hours
Schimmel	1 to 1.5 hours
Simonson	30 minutes
Stymiest	1 hour
Tatsis	1-2 hours
Yersh	3-4 hours